

### **REMARKS**

This is a response to the Office Action dated March 22, 2007. The Examiner has rejected claims 1-7, 8, 13, 14, 23-27, 33, 34 and 36-39 under 35 U.S.C. § 102(b) as being anticipated by U.S. Pat. No. 5,999,914 (“Blinn”). The rejection from the Office Action of is discussed below. No new matter has been added. Various claims have been amended for clarity and not for reasons related to patentability. Reconsideration of the application is respectfully requested in light of the above amendments and the following remarks.

#### **I. REJECTIONS UNDER 35 U.S.C. § 102(b)**

The Examiner has rejected claims 1-7, 8, 13, 14, 23-27, 33, 34 and 36-39 under 35 U.S.C. § 102(b) as being anticipated by Blinn. Blinn relates to an electronic promotion system for an electronic merchant system. In particular, Blinn discloses a promotion system including a merchant server for receiving and processing an order and applying promotions to items.

Blinn fails to disclose the “updating [of] the presentation of the store on the e-commerce storefront in real-time after the product database is updated” as in amended claim 1. Support for this amendment may be found in the Applicants’ specification, for example at ¶42. No new matter has been added. Blinn discloses that the merchant store server is connected to a storage device and a server, which is connected to one or more databases. Blinn, Col. 8, ll. 51-56. The databases are implemented using Structured Query Language (SQL) code, which is used for defining, updating and querying relational databases. *Id.* at Col. 8, ll. 56-61. Blinn further discloses that “the database module 140 retrieves data required by the store process from one of the databases 54, 56 [and] can retrieve data from a relational database independent of the structure or the schema of the database.” *Id.* at Col. 11, ll. 32-36. Blinn also discloses “[retrieving] product information pertaining to the corresponding product from one or more product tables stored on one of the databases 54, 56.” *Id.* at Col. 12, ll. 38-42. Nowhere in these disclosures in Blinn is there a disclosure of a real-time update of the storefront after the product database is updated as in claim 1.

Blinn fails to disclose that “the information concerning the products that is stored in the product database based on store tags in the e-commerce storefront that reference the

product information in the product database” as in amended claim 1. Support for this amendment may be found in the Applicants’ specification, for example at ¶38. No new matter has been added. Blinn discloses the use of HTML for documents and document authoring. *Id.* at Col. 4, ll. 45-61. In particular, HTML authoring uses codes (referred to as tags) that are embedded within the informational content of the document. *Id.* at Col. 4, ll. 49-52. The presence of HTML codes in HTML documents as in Blinn is not a disclosure of store tags “in the e-commerce storefront that reference the product information in the product database” as in claim 1.

Blinn fails to disclose “a store tag hub configured to manage store tags, wherein the store tags dynamically couple the information stored in the product database to the e-commerce storefront” as in amended claim 24. Support for this amendment may be found in the Applicants’ specification, for example at the description with respect to Figure 14 and ¶42. No new matter has been added. As discussed above, Blinn fails to disclose store tags, such as store tags that “dynamically couple the information stored in the product database to the e-commerce storefront” as in claim 24. In addition, Blinn fails to disclose a store tag hub configured to manage store tags as in claim 24. Blinn merely discloses that HTML documents may include HTML codes (or tags) that are embedded in the document. *Id.* at Col. 4, ll. 49-52.

Blinn fails to disclose that “store tags automatically update the e-commerce storefront upon an update to the product database by the user” as in amended claim 24. Support for this amendment may be found in the Applicants’ specification, for example at ¶38 and ¶42. No new matter has been added. As discussed above, Blinn fails to disclose store tags. In addition, Blinn fails to disclose the automatic update of the e-commerce storefront upon an update to the product database by the user as in both claims 1 and 24. Blinn discloses “[retrieving] product information pertaining to the corresponding product from one or more product tables stored on one of the databases 54, 56.” *Id.* at Col. 12, ll. 38-42. However, there is no disclosure of an automatic update by store tags as in claim 24.

Blinn fails to disclose “storing information concerning a plurality of products offered for sale through the first store in the first product database [and] . . . storing information concerning a plurality of products offered for sale through the second store in the second

product database” as in amended claim 37. Support for this amendment may be found in the Applicants’ specification, for example at ¶39 and ¶43. No new matter has been added. Blinn discloses the presence of multiple stores (shown within each process 32, 34, 36) and multiple databases (54, 56) which include product information. *Id.* at Figure 1A. However, the databases 54, 56 in Blinn are coupled with each of the multiple stores shown within the merchant store server 30. *Id.* at Figure 1A. There is no disclosure of a first product database with product information for a first store and a second product database with product information for a second store. Conversely, Blinn discloses multiple databases that provide product information to multiple stores. *Id.* at Figure 1A.

Blinn fails to disclose “an update to the first product database results in an automatic update of the first e-commerce storefront and an update to the second product database results in an automatic update of the second e-commerce storefront” as in amended claim 37. Support for this amendment may be found in the Applicants’ specification, for example at ¶42. No new matter has been added. As discussed above, Blinn discloses “[retrieving] product information pertaining to the corresponding product from one or more product tables stored on one of the databases 54, 56.” *Id.* at Col. 12, ll. 38-42. However, there is no disclosure of an automatic update as in claim 37. In addition, there is no disclosure of a first product database resulting in the update of a first e-commerce storefront and a second product database resulting in the update of a second e-commerce storefront as in claim 37. Conversely, the product databases in the promotion system of Blinn are coupled with and update each of the multiple stores. *Id.* at Figure 1A.

For the reasons described above, Applicants submit that independent claims 1, 24, and 37 are allowable. Likewise, claims dependent from allowable claims 1, 24, and 37 are also allowable. Specifically, dependent claims 2-7, 8, 13, 14, 23, 25-27, 33, 34, 36, 38 and 39 were rejected under 35 U.S.C. § 102(b) as being anticipated over Blinn and are allowable for the reasons discussed above regarding the independent claims from which they depend.

**II. CONCLUSION**

Each of the rejections in the Office Action dated March 22, 2007 have been addressed and no new matter has been added. Applicants submit that all of the pending claims are in condition for allowance and notice to this effect is respectfully requested. The Examiner is invited to call the undersigned if it would expedite the prosecution of this application.

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